EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TRAFFIC INFORMATION, LLC	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 2:14-cv-00718
	§	
STATE FARM MUTUAL AUTOMOBILE	§	
INSURANCE COMPANY,	§	
	§	
Defendant.	§	

**PLAINTIFF TRAFFIC INFORMATION, LLC'S DISCLOSURE OF
ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS**

Pursuant to P.R. 3-1, plaintiff Traffic Information, LLC ("Traffic") submits its "Disclosure of Asserted Claims and Infringement Contentions" as to defendant State Farm Mutual Automobile Insurance Company ("State Farm"). The contentions are marked "CONFIDENTIAL – OUTSIDE ATTORNEYS EYES ONLY PURSUANT TO P.R. 2-2" with the understanding that counsel may disclose the contentions to defendant if defendant agrees to maintain the contentions in confidence.

1.   **Right to Supplement**

Traffic bases these disclosures on its current knowledge, understanding and belief as to the facts and information available to it as of the date of these disclosures. This case is still in the early stages of discovery and Traffic has not yet completed its investigation, collection of information, discovery or analysis related to this action. Accordingly, Traffic reserves the right to supplement, amend or modify the information contained herein and to use and introduce such information and

any subsequently-identified documents at trial. In particular, Traffic reserves its right to amend and

supplement its identification of asserted claims and modify its identification of accused products.

Additionally, as further discovery is taken, and additional details are provided regarding the

defendant's activities, Traffic's infringement charts and contentions may need to be amended,

supplemented and/or corrected. Traffic also reserves its right to supplement its disclosure of

documents based upon further investigation and discovery.

2.   **Asserted Claims**

Based upon Traffic's present information, Traffic asserts claim 23 of U.S. Patent No.

6,785,606 against State Farm. Traffic reserves the right to assert additional claims against State

Farm based upon results of discovery and further investigation.

3.   **Accused Instrumentalities & Comparison To Asserted Claims**

The accused instrumentalities for State Farm are identified in the attached chart (Exhibit A)

in connection with State Farm's "Pocket Agent" application ("the Pocket Agent app"), which

compares them, element-by-element, to the above-listed Asserted Claims.

State Farm is liable for both direct and indirect infringement of the asserted claims. With

respect to indirect infringement, State Farm is liable for induced infringement. Examples of direct

infringements that State Farm has induced include the use and making of the systems including the

Pocket Agent app covered by the asserted claims by:

(1)   end users of mobile user stations (e.g., cell phones and tablets) that use the Pocket

Agent app, such as when such mobile user stations request traffic information, display traffic

information and/or corresponding map information, and/or act as a traffic monitor to detect vehicular

movement and transmit a signal including data representative of vehicular movement;

(2)   TeleNav, such as when it uses its computer system that is part of a claimed system to facilitate transmission of traffic information for display on a mobile user station; when it or one of its traffic partners' receiver receives signals including data representative of vehicular movement, when its computer system is interconnected with the receiver and a network; when its computer system provides traffic information and/or corresponding map information to a mobile user station, such as in response to a request for traffic information from the mobile user station; and/or when the traffic information and/or corresponding map information is displayed graphically on a mobile user station;

(3)   AT&T, such as when its receiver receives signals including data representative of vehicular movement, when its computer system is interconnected with the receiver and a network, when its computer system and/or network provides traffic information and/or corresponding map information to an mobile user station in response to a request for traffic information from the mobile user station, and/or when the traffic information and/or corresponding map information is displayed graphically on a mobile user station; and

(4)   Inrix, such as when it uses its computer system that is part of a claimed system to facilitate transmission of traffic information for display on a mobile user station; when it or one of its traffic partners' receiver receives signals including data representative of vehicular movement, when its computer system is interconnected with the receiver and a network; when its computer system provides traffic information and/or corresponding map information to a mobile user station, such as in response to a request for traffic information from the mobile user station; and/or when the traffic information and/or corresponding map information is displayed graphically on a mobile user station.

State Farm has induced and continues to induce such direct infringements through a variety of acts, a non-limiting and non-exhaustive representative list of which includes without limitation at least its following actions:

(1)   State Farm advertises and/or publicizes the Pocket Agent app, including in connection with various mobile user stations on which the Pocket Agent app operates;

(2)   State Farm makes the Pocket Agent app available on the Android Play Store for download on various mobile user stations; and

(3)   State Farm designed the Pocket Agent app to operate in conjunction with the AT&T Navigator app and to thereby make and use the traffic information systems described in the attached chart.

The Pocket Agent app defaults to the free mapping application dictated by the smart phone OS. One of the free mapping applications provided together with mobile devices used in conjunction with the AT&T network is AT&T Navigator. The Pocket Agent app is designed to use the default mapping service. Indeed, in such operation, the Pocket Agent app is designed to work in conjunction with the default third party mapping services, such as AT&T Navigator when used in conjunction with mobile devices on the AT&T network, to cause users of the Pocket Agent app to display directions to State Farm agent with a map including other items of interest, such as those previously mentioned, including traffic information as claimed in the '606 patent. In addition, it is well known that mapping applications, such as AT&T Navigator, include traffic information, and that a user seeking directions to an agent would see not just the directions but also associated traffic information displayed on the mobile phone.

State Farm specifically intended for users of its app to use this feature of its app to display driving directions to its agent locations on the display of the mobile phone, and further specifically intended that access to this feature to be controlled by State Farm's server (i.e., the user cannot pull up directions to any State Farm agent (and associated traffic information) unless the State Farm server provides the necessary location information). Furthermore, State Farm knew that a user's implementation of this feature of the Pocket Agent app would result in directions to the agent location being pulled up on a map on the display of a mobile phone with traffic information overlaid thereon. State Farm could have launched its app with the ability to merely display locations on a map, without the ability to display a map with traffic, but knowingly and intentionally chose not to do so.

Additional details related to State Farm's indirect infringing activities and various corresponding direct infringing activities are provided in the chart attached hereto.

State Farm is also a direct infringer of the asserted claims for at least the same reasons insofar as it engages in the same acts of direct infringement as described above. Additional details of State Farm's acts of infringement when it uses and makes the systems covered by the asserted claims are provided in the chart attached hereto.

With respect to direct infringement based on joint acts of multiple parties, the role of each such party in the direct infringement is described in the chart attached hereto.

State Farm may also be engaged in infringing activities in connection with products and/or services of which Traffic is not aware. Traffic reserves the right to amend its contentions and charts to include any other infringing activities that are identified through further investigation and discovery.

4. **Literal and Equivalents Infringement**

As supported and explained in the attached chart, it is currently believed that each of the elements of claim 23 of the '606 patent is met literally, and if any claim limitation is not met literally, then it is met under the doctrine of equivalents. It is expected that the same facts upon which Traffic's literal infringement claim is based will also form the basis of Traffic's doctrine of equivalents claim, as any differences between the limitations of the asserted claims and the accused products are insubstantial. With respect to the doctrine of equivalents, however, as State Farm has not yet provided details of its non-infringement positions, Traffic reserves the right to present further facts to support assertions of infringement under the doctrine of equivalents.

5. **Priority Date**

Each asserted claim is entitled to a priority date of April 19, 1999.

6. **P.R. 3-2 Document Production**

Traffic has made a reasonable investigation for documents identified in P.R. 3-2. It is believed that all such non-privileged documents have been assembled. These documents are available for inspection and review at the offices of Polasek, Quisenberry & Errington, LLP upon entry of a protective order. Traffic will cooperate with State Farm to produce these documents in electronic form to avoid the need for inspection and review prior to production. Traffic's documents corresponding to P.R. 3-2(b) include at least those numbered T009538-T009545. Traffic's documents corresponding to P.R. 3-2(c) are numbered T000001-T004024.

Respectfully submitted,

Dated: August 26, 2014   By: _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that State Farm's counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3) are being served this 26th day of August, 2014 via electronic mail with a copy of this document.

Jeanne P Smaistle

EXHIBIT A

| U.S. Patent No. 6,785,606	State Farm "Pocket Agent" app
23. A system for providing traffic information to a plurality of mobile users connected to a network, comprising:	State Farm Mutual Automobile Insurance Company (hereafter referred to as "State Farm") provides an application[1] on the Play Store, the State Farm Pocket Agent app (the "Pocket Agent app"), which is made available to be downloaded onto Android mobile phones and tablets.[2] The Pocket Agent app forms part of and is used to make claimed systems for providing traffic information to a plurality of mobile users connected to a network. State Farm makes and uses such systems and induces others (e.g., end users of mobile telephones running the accused app) to make and use such systems. The Pocket Agent app operates on a number of different mobile user stations. Its use in connection with the AT&T Navigator application operating on the Huawei Fusion 2 is seen herein, though other handsets are encompassed by these contentions. Separate acts of direct infringement by State Farm occur each time the claimed system is used and/or made through use of the Pocket Agent app. Non-limiting examples of separate and distinct acts of direct infringement occur each time the computer system as described below is used to provide traffic information representative of signals transmitted from a traffic monitor, and each time transmitted traffic information is displayed graphically on the display of a mobile user station. Reproduced below is a photograph of the Pocket Agent app available for download on the Play Store onto a Huawei Fusion 2 mobile user station (e.g. Android mobile device): Reproduced below is a photograph of the description portion of the Pocket Agent app on the Play Store, which claims the ability to "Search for an agent near you":
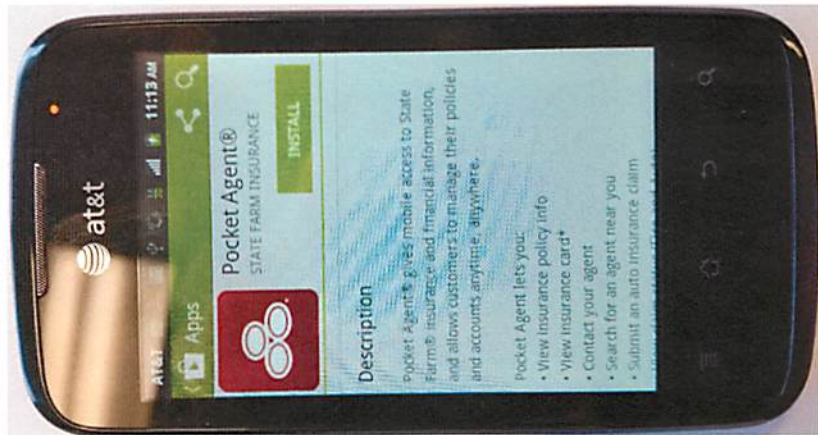
The photograph below is of the End User License Agreement for the Pocket Agent app, showing that State Farm Mutual Automobile Insurance Company provides the app.
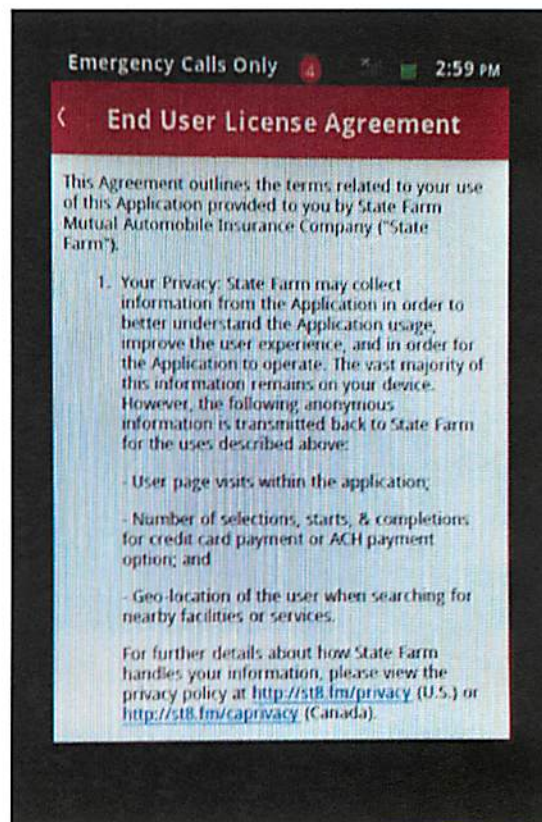
The below photograph shows the "Visit webpage" link in the developer section of the Play store page for the Pocket Agent app, allowing the user to view the developer's webpage.
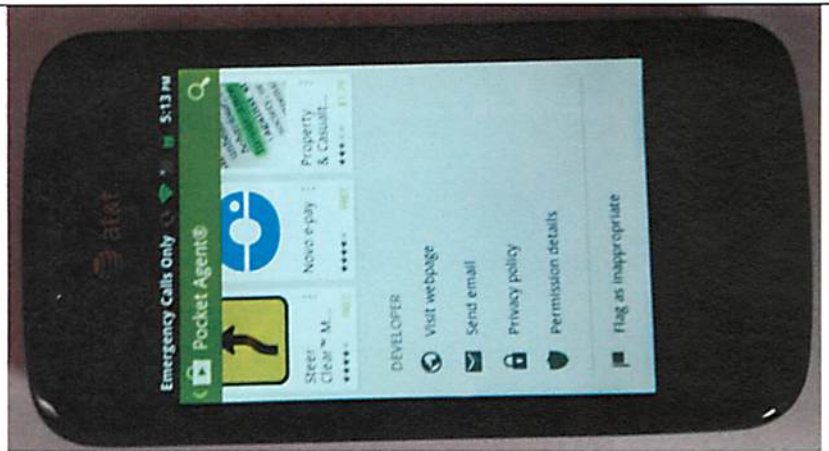
Clicking on the "Visit webpage" link shown in the photograph above directs the screen to the web page shown in the screen shot below, showing that State Farm is the developer of the Pocket Agent app:


Scrolling to the bottom of the webpage shown in the prior photograph shows the below copyright information, stating that State Farm Mutual Automobile Insurance Company provides the content.

Reproduced below is a photograph of the download and allow access conditions of the Pocket Agent app displayed on the Huawei Fusion 2, with "Location" being included in the permissions list:
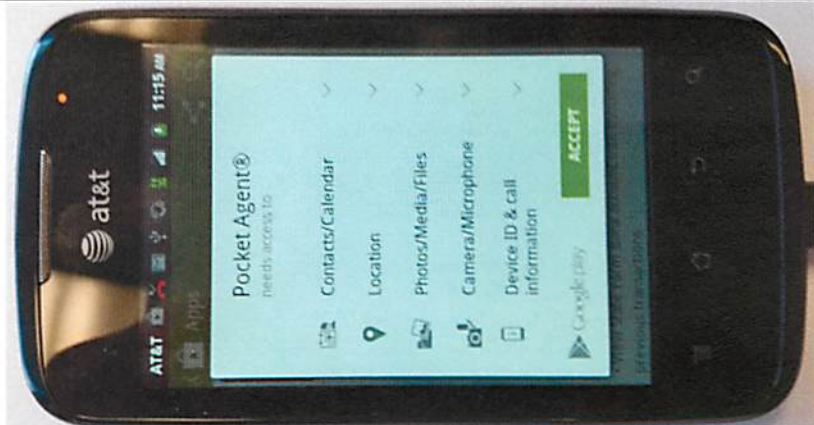
Reproduced below is a photograph of the loading screen of the downloaded Pocket Agent app displayed on the Huawei Fusion 2:
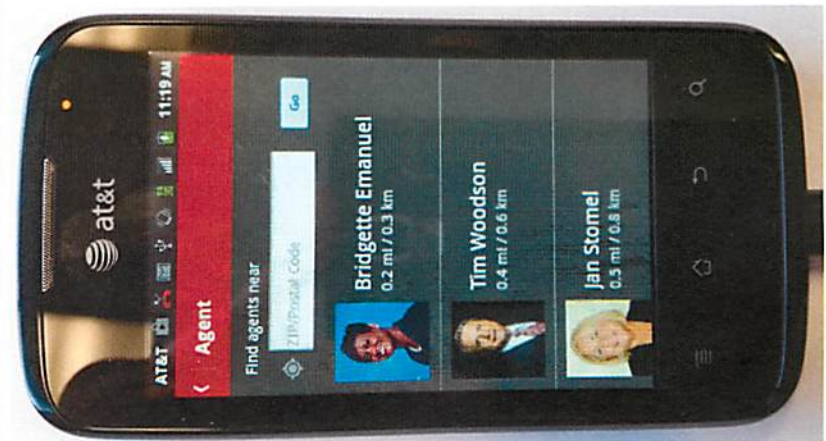

Reproduced below is a photograph of the initial screen of the downloaded Pocket Agent app displayed on the Huawei Fusion 2 after the Pocket Agent app has finished loading:
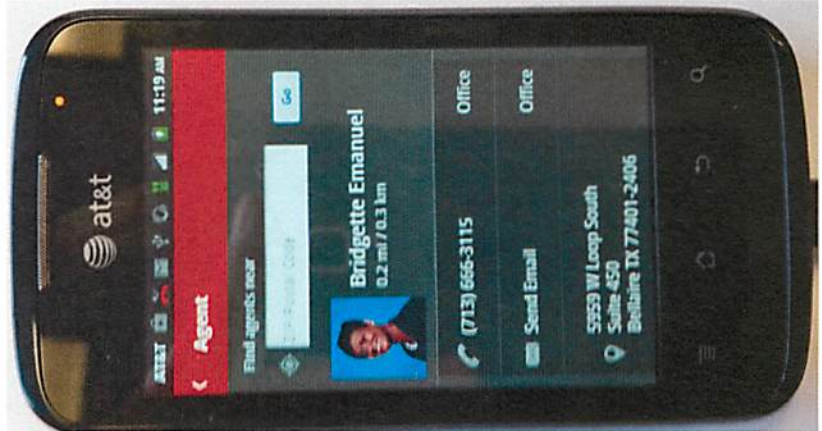
Reproduced below is a photograph of the home screen of the downloaded Pocket Agent app displayed on the Huawei Fusion 2 after pressing the "Find an agent near you" button on the previous screen:

Reproduced below is a photograph of the screen on the Huawei Fusion 2 after selecting an agent on the previous screen, showing details for that particular agent:

Reproduced below is a photograph of the screen on the Huawei Fusion 2 after selecting the address information on the previous screen:
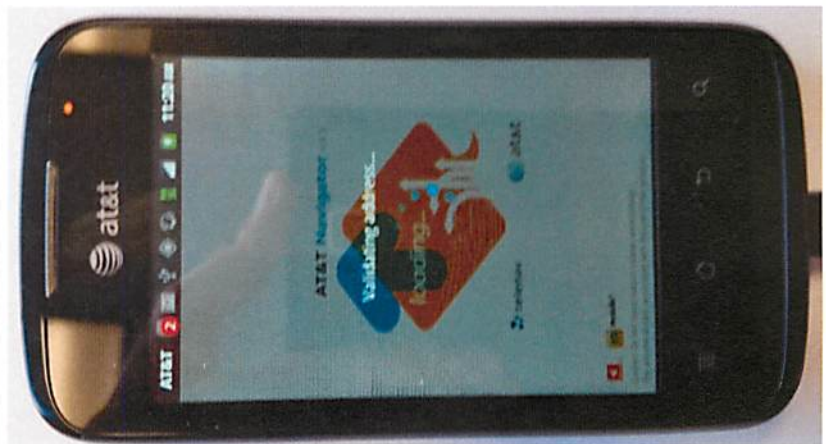

Reproduced below is a photograph of the screen on the Huawei Fusion 2, after selecting the directions icon in the text box on the previous screen:

Reproduced below is a photograph of the loading screen, featuring the TeleNav logo, on the Huawei Fusion 2 after selecting the "AT&T Navigator" button on the previous screen:

Reproduced below is a photograph of the screen on the Huawei Fusion 2 showing the selected State Farm agent location, as provided by the State Farm server, near the phone based upon pressing the "AT&T Navigator" button on the previous screen, together with traffic information, the map being based upon the location of the Huawei Fusion 2 phone and the State Farm agent location:

As more fully explained below, when State Farm's web server receives a communication from an Android mobile device (e.g., a mobile phone or tablet) running the Pocket Agent app, State Farm then, through its web server, responds to that communication thereby directly infringing claim 23 of the '606 patent by its use of the traffic information system covered by claim 23 of the '606 patent.

More specifically, State Farm makes and uses such systems for providing traffic information to a plurality of mobile users connected to a network, such as a WiFi network and/or the AT&T network. It is further believed that State Farm directly infringes claim 23 during testing of the Pocket Agent app through its use and making of the claimed system.

State Farm is also liable for indirect infringement based upon various acts that induce others to infringe claim 23.

For example, State Farm indirectly infringes claim 23 by inducing individuals (e.g., State Farm users) to download the Pocket Agent app onto an Android mobile device (e.g., phone and/or tablet) and then use the mobile device with the Pocket Agent app to make and use the claimed system.

As another example, State Farm further indirectly infringes claim 23 by inducing third parties such as Telenav to directly infringe claim 23 by using Telenav's computer system to provide traffic information to mobile users stations running the AT&T Navigator application that was launched through the Pocket Agent app.

As yet another example, State Farm has induced direct infringements by others by designing the Pocket Agent app to operate the AT&T Navigator application, as described and illustrated elsewhere herein.

a) a plurality of traffic monitors, each said traffic monitor comprising at least a detector and a transmitter, said detector providing a signal including data representative of vehicular movement and said transmitter transmitting said signals;	The Pocket Agent app, which operates on a number of different cellular phones and tablets (such as the Huawei Fusion 2, as seen herein), on a variety of different cellular or WiFi networks, including AT&T, can be downloaded through the Android Play Store. Once downloaded and activated, the Pocket Agent app encourages users to find nearby State Farm locations. The Pocket Agent app is used to provide a map of same with traffic information overlaid thereon. This is shown in more detail in the series of photographs included herein. This functionality is provided by way of the AT&T Navigator application, as seen in the image below and in the photograph included herein. As the image below shows, the Pocket Agent app has identified a nearby State Farm location, based upon data from the State Farm web server, and it is shown pinpointed it on a map in the AT&T Navigator application. When the app pulls up the map on which it pinpoints the business, based upon data from the State Farm web server, traffic information will also be displayed overlaid on the map, as discussed further, below.

The mobile user stations that are compatible with the AT&T Navigator application, which is provided by TeleNav, are identified on TeleNav's website.[3] For example, the Fusion 2 is compatible with the "AT&T Navigator" version of TeleNav GPS Navigator. The features specification on TeleNav's website for TeleNav GPS Navigator reflects that TeleNav GPS Navigator includes "detailed information on incidents and speeds along your route."[4]

As explained on TeleNav's website, the TeleNav Traffic feature of TeleNav GPS Navigator "provides detailed information on incidents and speeds along your route."[5] This is illustrated in the screen shot reproduced to the right from TeleNav's website. TeleNav's website further lists "Traffic-flow maps" as a feature, stating:

"Need a quick look at traffic? View a high-level map with color-coded roads that show traffic conditions of your route, an address, city or point of interest (POI)." This is illustrated in the screen shot shown to the left from TeleNav's website.
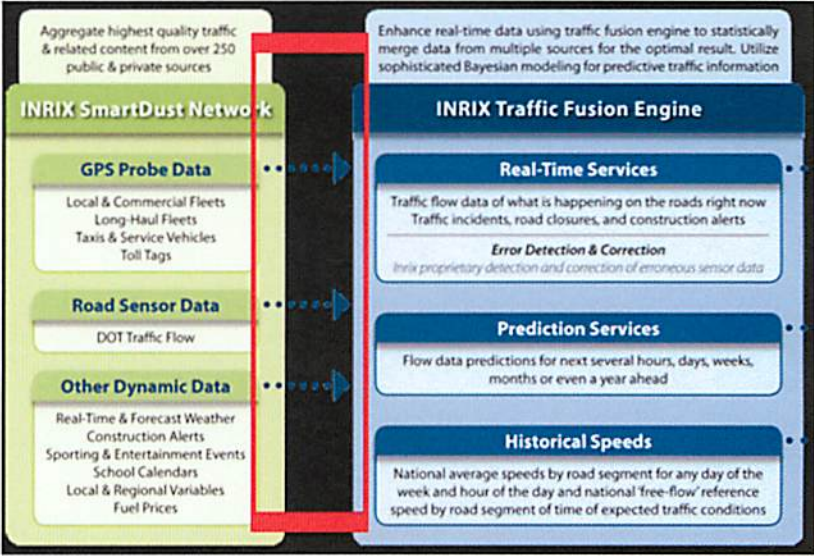
TeleNav issued a Press Release on January 8, 2007, announcing that it was adding TeleNav Traffic as a new feature of TeleNav GPS Navigator.[6] On that same day, Inrix Inc., "the leading provider of traffic information in the U.S.", also issued a Press Release announcing that it had been selected by TeleNav as its partner to provide the traffic information for the new TeleNav Traffic feature.[7] The release states that the new TeleNav Traffic feature "regularly monitors traffic and proactively alerts users of slowdowns and incidents along their routes."

The Inrix Press Release further provides, "TeleNav Traffic leverages Inrix's Smart Dust Network, which consists of traffic-related data from over 250 public and private sources including traditional road sensors, the world's largest network of GPS-enabled vehicles, and traffic incident and construction data from Clear Channel Traffic." As further explained on the Inrix website, the Smart Dust Network obtains its data from "hundreds of public and private sources – including anonymous, real-time GPS probe data from more than 800,000 commercial fleet, delivery and taxi vehicles; toll tag data from systems such as California's FasTrak system; and road occupancy and speed measurements from Departments of Transportation around the country."[8]

There are a variety of sources within the Smart Dust Network (e.g., traditional road sensors, the world's largest network of GPS-enabled vehicles made up of anonymous, real-time GPS probe data from more than 800,000 commercial fleet, delivery and taxi vehicles; toll tag data from systems such as California's FasTrak system; and road occupancy and speed measurements from Departments of Transportation around the country, etc.) that comprise "traffic monitors". These sources include at least a detector and a transmitter. Each detector provides a signal including data representative of vehicular movement, and each

	transmitter transmits the signals.
(b) a receiver that receives said signals transmitted by said traffic monitors;	The traffic monitors in the Inrix Smart Dust Network are generally remote and include "anonymous, real-time GPS probe data from more than 800,000 commercial fleet, delivery and taxi vehicles; toll tag data from systems such as California's FasTrak system; and road occupancy and speed measurements from Departments of Transportation around the country."[9] The "Inrix Fusion Engine" receives the data generated by the traffic monitors in the Smart Dust Network and uses them to "generate accurate real-time and predictive traffic data."[10] As seen in the image below, taken from the Inrix website, the Inrix Fusion Engine includes a receiver. The boxed area in the image indicates the transmission of data from the Smart Dust Network, and its receipt by the Inrix Fusion Engine.[11] The Inrix Fusion Engine includes a receiver to receive the signals transmitted from the transmitters. Devices that receive signals transmitted by traffic monitors are also located within other portions of the "INRIX SmartDust Network", such as for example, devices that receive signals from "road sensors" referenced in the above illustration in connection with "DOT Traffic Flow". Accordingly, the system provides traffic information to the app operating on a compatible mobile user station, such as the Fusion 2, includes a receiver that receives the signals transmitted by the traffic monitors.
(c) a computer system interconnected with said receiver and said network;	The computer system in the Inrix and TeleNav system is made up of Inrix computers and/or TeleNav computers that, individually and/or working together, provide traffic information to the AT&T or other cellular or Wifi network. The Inrix computer system is part of the

"Inrix Traffic Fusion Engine," which is displayed graphically below.[12]

The Inrix Traffic Fusion Engine utilizes "sophisticated Bayesian modeling and proprietary error correction technology to process the hundreds of data sources aggregated by the Inrix Smart Dust Network and generate accurate real-time and predictive traffic data."[13] As shown by the red box in the graphic below, the results of the operations performed by the Inrix Traffic Fusion Engine are delivered to Inrix customers, such as TeleNav, "through an XML interface that enables flexible delivery to end users via many different methods."[14]
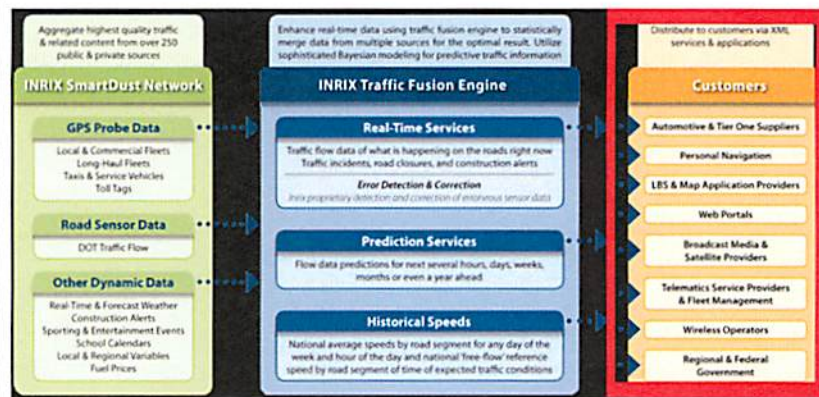
The TeleNav computers consist of servers that contain "relevant maps, business, [and] gas prices," among other things.[15] These servers are regularly updated "with the latest maps."[16] As described above, the data used by TeleNav and that is contained on its servers is obtained through Inrix. Specifically, "TeleNav Traffic leverages Inrix's Smart Dust Network, which consists of traffic-related data."[17] The TeleNav computer system sends the map and traffic data to each user's handset through cell phone towers.[18] The TeleNav computer system, individually and/or in combination with the Inrix computer

	system, comprises the computer system. For the computer system to provide traffic information to mobile users, it is interconnected with a network, namely the AT&T network or WiFi network. The photograph below shows a mobile user station interconnected to a WiFi network and the AT&T network, and accessing TeleNav data by way of the app. Accordingly, the computer system that provides traffic data to mobile user stations compatible with the app, such as the Fusion 2, for example, is a computer system interconnected with the receiver and the network.
(d) a mobile user station includes a display, and a receiving device;	The Huawei Fusion 2 is an example of a mobile user station for which the app is designed that includes a display. It is also an example of such a mobile user station including a receiving device that enables the mobile user station to receive data. For example, the website advertising the Fusion 2 highlights certain features of the Fusion 2, including the ability of mobile users to access their mobile email, AOL, Windows Live, AOL, and other applications.[19]

	In addition, the Fusion 2 is an example of a State Farm app-compatible mobile user station equipped with a global positioning system receiver. For example, in the photograph above, the red circle indicates the position of the Fusion 2.
(e) said computer system providing to said one of said mobile user stations traffic information representative of said signals transmitted by said traffic monitors;	The app is designed so that the State Farm app-compatible mobile user stations receive traffic information from the computer system, by way of the AT&T Navigator application. The TeleNav GPS Navigator website notes that the application (which underlies the AT&T Navigator application, as discussed above) provides "GPS navigation service with traffic rerouting on consumer mobile phones."[20]

The computer system provides to the mobile user station traffic data that the mobile user station displays.

The provision of traffic data to a mobile user station is described on the TeleNav website: after a mobile user station has made "a request for directions, the signal goes from [the user's] handset through a cell phone tower to the TeleNav servers. TeleNav immediately pulls up the relevant maps, businesses, gas prices, etc. and sends this information back through the cell phone towers to your handset."[21] In addition, the TeleNav GPS Navigator website advertises the ability to provide "GPS navigation service with traffic rerouting on consumer mobile phones."[22] The computer system provides traffic information to a mobile user station.

The graphic below shows a schematic depiction of the delivery of data by the computer system, which includes the Inrix Fusion Engine (as indicated in the red box in the graphic). The Inrix Fusion Engine receives traffic information signals from the Smart Dust Network (as indicated in the yellow box in the graphic). As seen in the graphic, the computer system provides traffic information representative of the signals from the traffic monitors in the Smart Dust Network to the mobile user stations through the AT&T or WiFi network.

	The computer system sends to the mobile user station traffic data that corresponds to the map area provided to the mobile user station. The mobile user station displays the traffic information overlaid on a map sent by the computer system.
(f) said traffic information transmitted by said computer system is displayed graphically on said display; and	The traffic information transmitted by the computer system is displayed graphically on the display of the mobile user station on which the app is operating (such as the Huawei Fusion 2), as seen in the photographs herein.
(g) wherein the displayed traffic information geographically encompasses the current geographic position of said mobile user station wherein said displayed graphically is such that respective graphical representations of said traffic information indicates different absolute traffic relative to different roads.	The computer system has maps. For example, as described in the TeleNav GPS Navigator feature matrix on the TeleNav website, TeleNav GPS Navigator includes "2D moving maps," "3D moving maps," and "static map[s]."[23] In addition, maps provided by the computer system can be seen in the photographs above. As described above in (e), the computer system provides map information to the mobile user station. For example, after a mobile user station has made "a request for directions, the signal goes from [the user's] handset through a cell phone tower to the TeleNav servers. TeleNav immediately pulls up the relevant maps, businesses, gas prices, etc. and sends this information back through the cell phone towers to your handset."[24] The traffic information provided to the handset is displayed graphically in a manner that geographically encompasses the current geographic position of the mobile user station, as shown below, where the green dot indicates the current geographic position of the mobile user station: Inrix, on their website, details that the traffic information that is displayed graphically is color coded as a percentage of the reference speed of the roadway using hatched for closed, red for 0-31 percent, orange for 32-61 percent, yellow for 62-82 percent, and green for 83-100 percent.[25]

As such, the color that is displayed graphically along the road as shown on the mobile device display will depend on the reference speed (i.e., the posted speed limit) for the particular road. This means that green will denote one range of traffic speeds for a freeway and a different, or lower, range of traffic speeds for an arterial that has a lower posted speed limit. For example, if the posted speed for a freeway is 60 MPH and the traffic is moving at 30 MPH, then the % of reference speed according the Inrix illustration below would be 50%, which would result in a color code of orange since 50% falls into the range between 32 and 61. However, if traffic is moving at that same speed, i.e., 30 MPH, on an arterial that has a speed limit of 30 MPH, then the corresponding color code range according the legend in the Inrix illustration below would be green since the % of reference speed would be 100.

Accordingly, the traffic information is displayed graphically such that respective graphical representations of the traffic information indicates different absolute traffic relative to different roads.

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[1] *See* State Farm, available at https://www.statefarm.com/about-us/innovation-research/mobile-apps/pocket-agent-for-android.
[2] *See* play.google.com, *Pocket Agent*, available at
https://play.google.com/store/apps/details?id=com.statefarm.pocketagent&hl=en.
[3] *See* TeleNav, Inc., *AT&T Compatible Devices for TeleNav GPS Navigator*, available at
http://www.telenav.com/products/tn/devices/att.html (hereinafter "AT&T TeleNav Devices.")
[4] *See* TeleNav, Inc., *TeleNav GPS Navigator Features*, available at
http://www.telenav.com/products/tn/features.html.
[5] *See* TeleNav, Inc., *Avoid traffic with TeleNav GPS Navigator*, available at
http://www.telenav.com/products/tn/traffic.html.
[6] *See* TeleNav, Inc., *TeleNav Launches First GPS Navigation Service With Traffic Rerouting For Consumer Mobile Phones*, available at http://www.telenav.com/about/pr/pr-20070108.html.
[7] *See* Inrix, *TeleNav Inc. Selects INRIX as Traffic Information Partner for TeleNav GPS Navigator and TeleNav Traffic*, available at www.inrix.com/pressrelease.asp?ID=20 (hereinafter "TeleNav Selects Inrix.").
[8] *See* Inrix, *The Inrix Smart Dust Network*, available at http://www.inrix.com/techdustnetwork.asp.
[9] Inrix, *The Inrix Smart Dust Network*, n. 8, *supra*.
[10] *See* Inrix, *The Inrix Traffic Fusion Engine*, available at http://www.inrix.com/fusion.asp.
[11] *See* Inrix, *Technology Overview*, available at http://www.inrix.com/technology.asp.
[12] *See Technology Overview*, n.11, *supra*.
[13] *See The Inrix Traffic Fusion Engine*, n.10, *supra*.
[14] *See* Inrix, *Traffic Delivery*, available at http://www.inrix.com/delivery.asp.

[15] *See* TeleNav, Inc., *Technology*, available at http://www.telenav.com/about/technology.html.

[16] *Id.*

[17] *See* TeleNav, Inc., *TeleNav Selects INRIX*, n. 7, *supra.*

[18] *See* TeleNav, Inc., *Technology*, n.15, *supra.*

[19] *See* AT&T, *AT&T Fusion 2*, available at http://www.wireless.att.com/cell-phone-service/cell-phone-details/index.jsp?device=AT&T+Fusion 2+-+Black&q_sku=sku4980493#fbid=snCZdXmWQaG

[20] *See* TeleNav, Inc., *Avoid traffic with TeleNav GPS Navigator*, n. 5, *supra.*

[21] *See* TeleNav, Inc., *Technology*, n.15, *supra.*

[22] *See* TeleNav, Inc., *TeleNav GPS Navigator Features*, n.4, *supra.*

[23] *See TeleNav GPS Navigator Feature Matrix*, available at http://www.telenav.com/products/tn/feature-matrix.html.

[24] *See* TeleNav, Inc., *Technology*, n.15, *supra.*

[25] See, Inrix, *Traffic Flow Data Solutions*, available at http://www.inrix.com/trafficinformation.asp